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10 *Attorneys for Respondent*
11 **YAHOO! INC.**

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

In Re: Application Pursuant to 28 U.S.C. § 1782
of RUSSELL KNAGGS,

Case No.: 5:15-mc-80281-PSG

Petitioner,
- to take discovery of -
YAHOO! INC.,
Respondent.

**JOINT STIPULATION AND [PROPOSED]
ORDER ON PROVISIONAL AGREEMENT
RE: 1782 DISCOVERY**

Judge: Magistrate Judge Paul Singh Grewal

1 Respondent Yahoo! Inc. ("Yahoo" or "Respondent") and Petitioner Russell Knaggs
2 ("Petitioner" or "Knaggs") hereby stipulate as follows:

3 WHEREAS, on November 16, 2015, Petitioner filed an Application and Memorandum of Law
4 in support of his Application pursuant to 28 U.S.C. § 1782 ("Section 1782") seeking an Order
5 directing Yahoo to produce the following Yahoo employees for deposition in Knaggs' appeal of his
6 criminal conviction in the United Kingdom: (1) Sonja Durnin, Global Compliance Director of Yahoo!
7 Inc; (2) Narayan Dash, Director of Engineering at Y! Communications; and (3) David Spriggs, Back-
8 End Mail Principal Engineer of Yahoo! Inc.;

9 WHEREAS, having conferred through their respective undersigned counsel, the parties desire
10 to attempt to resolve this matter through a stipulated agreement before seeking the Court's
11 intervention;

12 WHEREAS, contingent on the Court granting this stipulation, Yahoo has agreed to provide
13 responses to a limited number of written interrogatories, not to exceed fifteen, on an expedited basis,
14 not to exceed two weeks, in an effort to avert the need to litigate Mr. Knaggs' Section 1782 Petition;

15 NOW, THEREFORE, the parties, through their respective counsel of record, hereby stipulate
16 and agree, and ask the Court to enter an Order as follows:

- 17 1. This stipulation, and the resulting discovery, is without prejudice to Mr. Knaggs
18 ability to seek the relief sought in his petition and for Yahoo to oppose that relief.
- 19 2. All dates in connection with this matter, other than those specifically set forth
20 below, shall be vacated indefinitely.
- 21 3. Petitioner is ordered to submit written interrogatories seeking the information he
22 would have sought from the deposition witnesses to Yahoo by or on December 23,
23 2015. Petitioner shall be limited to 15 individual interrogatory requests, including
24 all discrete subparts.
- 25 4. Respondent is ordered to serve written responses to Petitioner's interrogatories by or
26 on January 13.
- 27 5. Petitioner shall have 45 days from the date of service of Respondent's written

1 responses to file a motion to compel or seek other relief from the Court, including an
2 order for the depositions originally requested.

3 6. Both parties reserve the right to seek to modify this Order for good cause shown.
4

5 Dated: December 11, 2015
6

EAGAN AVENATTI, LLP

ZWILLGEN LAW LLP

8 By: /s/ Carlos X. Colorado
9 CARLOS X. COLORADO (SBN 231031)
10 Attorneys for Petitioner
RUSSELL KNAGGS

By: /s/ Anna Hsia
ANNA HSIA (SBN 234179)
Attorneys for Respondent
YAHOO!, Inc.

11 IT IS SO ORDERED.
12

13 Dated: _____
14

15 PAUL SINGH GREWAL
16 United States Magistrate Judge
17

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2 **ATTESTATION OF E-FILED SIGNATURE**
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4

I, Anna Hsia, am the ECF User whose ID and password are being used to file this. Pursuant to
Civil L.R. 5-1(i)(3), I hereby attest that Carlos X. Colorado has concurred in this filing.
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7 _____
8 /s/ Anna Hsia
9 Anna Hsia
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2 **CERTIFICATE OF SERVICE**
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4 I hereby certify that on December 11, 2015, I electronically filed the foregoing **JOINT**
5 **STIPULATION AND [PROPOSED] ORDER ON PROVISIONAL AGREEMENT RE: 1782**
6 **DISCOVERY** with the Clerk of the Court using the CM/ECF system, which sent notification of such
7 filing to the following:
8

9 Carlos X. Colorado
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16 /s/ Anna Hsia

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